



ASDGF
2011

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May 15, 2008

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MAY 19 2008

Environmental
Cleanup Office

Mr. Kevin L. Rochlin
Remedial Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, ECL-111
Seattle, WA 98101

RE: Monthly Report: No. 143, April 2008
Operable Unit No. 02
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill
Site Manager

Attachment (2 copies)

cc: Chung Ki Yee - Washington Department of Ecology
Evan Griffiths - CH2MHill (2 copies)
Richard Kauffman - ATSDR c/o U.S. EPA Region 10
Leslie Ann Rose - Citizens for a Healthy Bay



Monthly Report No. 143, April 2008

Operable Unit 02

Asarco Tacoma Smelter Site

A. *Actions taken to achieve compliance with the Consent Decree during the previous month.*

1. A regular monthly design review meeting was not held in April.
2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
3. Remedial Action activities continued.

B. *Summary of sampling, tests, and all other data received or generated by Point Ruston in the previous month.*

1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April.

Monthly averages and individual results for samples collected by Point Ruston in April are attached. There was no exceedance of the interim discharge limits.

2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 5,050 gallons of leachate (6.2 ppm results attached) on April 14, 2008.

C. *Work Plans and other deliverables completed and submitted during the previous month.*

1. In a letter dated April 25, 2008, EPA gave Point Ruston authorization to start work on Point Ruston remediation and phase 1 development with excavation and pouring of the foundation for Building 2A.

2. Remedial Action during April included the following tasks:

- OCF construction activities:
 - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.
- Stack Hill construction activities:
 - Maintained erosion and surface water controls
 - Continued development activities, continued installation of dry utilities and framing of the first model home
 - Hauled utility trench soils to lower site for use as cap materials
- Site-wide remediation/redevelopment activities:
 - Continued surface water controls
 - Maintained haul roads and stockpiles onsite
 - Maintained erosion and surface water controls
 - Began construction of clean roads/areas for Building 2A

D. Actions scheduled for the next six weeks.

1. Point Ruston will submit responses to EPA comments received on the Point Ruston Remediation Design on March 5, 2008. A revised design will also be submitted incorporating revisions based on EPA comments received.
2. Point Ruston will submit responses to EPA comments received on the Stack Hill Institutional Control Plan on March 25, 2008. A revised Institutional Control Plan will also be submitted incorporating revisions based on EPA comments received.
3. The following Remedial Action tasks are planned to continue:
 - RA Monitoring:
 - Outfall sampling (weekly composite samples) during scheduled months
 - Air monitoring during remedial action activities
 - OCF construction activities:
 - Continue collection of leachate for offsite disposal
 - Continue monitoring of leachate volumes
 - Stack Hill construction activities:
 - Erosion controls and site maintenance
 - Continue development activities including dry utility installation, sidewalk construction, road paving, and model home construction
 - Site-wide construction activities:
 - Continue surface water controls
 - Maintain roads and stockpiles onsite
 - Maintain erosion controls
 - Complete clean road/area construction for Building 2A
 - Begin excavation of foundation for Building 2A

Monthly Report No. 143, April 2008
Operable Unit 02
Asarco Tacoma Smelter Site

E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.

1. Point Ruston is completing permitting for development on the lower site with the City of Tacoma including a shoreline development permit and building permits.

F. Modifications to work plans or schedules proposed to or approved by EPA.

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.

G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.

1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1st and 3rd Monday of each month).
2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.

Table 1. Summary of April 2008 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.038	7.60%	0.015	3.00%	0.023	4.50%
North Outfall	0.016	3.10%	0.005	1.00%	0.003	0.50%

* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.



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LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter OCF Leachate
Lab ID: B08040097-001
Client Sample ID: TSM030831

Report Date: 04/07/08
Collection Date: 03/31/08 13:08
Date Received: 04/01/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	6.2	mg/L		0.1		E200.7	04/05/08 11:45 / rth

Report Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



ANALYTICAL SUMMARY REPORT

May 07, 2008

Tim Rusher

Point Ruston LLC

5219 N Shirley St Ste 100

Tacoma, WA 98407

Workorder No.: B08043007

Project Name: Tacoma Smelter Outfall Monitoring

Energy Laboratories Inc received the following 8 samples from Point Ruston LLC on 4/30/2008 for analysis.

Sample ID	Client Sample ID	Collect Date	Receive Date	Matrix	Test
B08043007-001	TSM0408407 N Comp	04/07/08 13:19	04/30/08	Aqueous	Metals by ICP/CPMS, Total Metals Digestion by EPA 200.2
B08043007-002	TSM0408107 S Comp	04/07/08 13:31	04/30/08	Aqueous	Same As Above
B08043007-003	TSM0408414 N Comp	04/14/08 7:20	04/30/08	Aqueous	Same As Above
B08043007-004	TSM0408114 S Comp	04/14/08 7:15	04/30/08	Aqueous	Same As Above
B08043007-005	TSM0408421 N Comp	04/21/08 9:57	04/30/08	Aqueous	Same As Above
B08043007-006	TSM0408121 S Comp	04/21/08 10:11	04/30/08	Aqueous	Same As Above
B08043007-007	TSM0408428 N Comp	04/28/08 9:22	04/30/08	Aqueous	Same As Above
B08043007-008	TSM0408128 S Comp	04/28/08 9:42	04/30/08	Aqueous	Same As Above

Any exceptions or problems with the analyses are noted in the Laboratory Analytical Report, the QA/QC Summary Report, or the Case Narrative.

If you have any questions regarding these tests results, please call.

Report Approved By: _____



LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring
Lab ID: B08043007-001
Client Sample ID: TSM0408407 N Comp

Report Date: 05/07/08
Collection Date: 04/07/08 13:19
Date Received: 04/30/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.019	mg/L		0.005		E200.8	05/02/08 22:59 / jjw
Copper	0.02	mg/L		0.01		E200.8	05/02/08 22:59 / jjw
Zinc	0.01	mg/L		0.01		E200.8	05/02/08 22:59 / jjw

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring
Lab ID: B08043007-002
Client Sample ID: TSM0408107 S Comp

Report Date: 05/07/08
Collection Date: 04/07/08 13:31
Date Received: 04/30/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.043	mg/L		0.005		E200.8	05/02/08 23:07 / jjw
Copper	0.02	mg/L		0.01		E200.8	05/02/08 23:07 / jjw
Zinc	0.03	mg/L		0.01		E200.8	05/02/08 23:07 / jjw

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring
Lab ID: B08043007-003
Client Sample ID: TSM0408414 N Comp

Report Date: 05/07/08
Collection Date: 04/14/08 07:20
Date Received: 04/30/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.016	mg/L		0.005		E200.8	05/02/08 11:18 / jjw
Copper	ND	mg/L		0.01		E200.8	05/02/08 11:18 / jjw
Zinc	ND	mg/L		0.01		E200.8	05/02/08 11:18 / jjw

Report
Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring
Lab ID: B08043007-004
Client Sample ID: TSM0408114 S Comp

Report Date: 05/07/08
Collection Date: 04/14/08 07:15
Date Received: 04/30/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.037	mg/L		0.005		E200.8	05/06/08 00:26 / jjw
Copper	0.01	mg/L		0.01		E200.8	05/06/08 00:26 / jjw
Zinc	0.02	mg/L		0.01		E200.8	05/06/08 00:26 / jjw

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring
Lab ID: B08043007-005
Client Sample ID: TSM0408421 N Comp

Report Date: 05/07/08
Collection Date: 04/21/08 09:57
Date Received: 04/30/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.014	mg/L		0.005		E200.8	05/06/08 00:34 / jjw
Copper	ND	mg/L		0.01		E200.8	05/06/08 00:34 / jjw
Zinc	ND	mg/L		0.01		E200.8	05/06/08 00:34 / jjw

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



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LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring
Lab ID: B08043007-006
Client Sample ID: TSM0408121 S Comp

Report Date: 05/07/08
Collection Date: 04/21/08 10:11
Date Received: 04/30/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.036	mg/L		0.005		E200.8	05/06/08 00:41 / jjw
Copper	0.01	mg/L		0.01		E200.8	05/06/08 00:41 / jjw
Zinc	0.02	mg/L		0.01		E200.8	05/06/08 00:41 / jjw

Report
Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring
Lab ID: B08043007-007
Client Sample ID: TSM0408428 N Comp

Report Date: 05/07/08
Collection Date: 04/28/08 09:22
Date Received: 04/30/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.013	mg/L		0.005		E200.8	05/03/08 00:17 / jjw
Copper	ND	mg/L		0.01		E200.8	05/03/08 00:17 / jjw
Zinc	ND	mg/L		0.01		E200.8	05/03/08 00:17 / jjw

Report RL - Analyte reporting limit.
Definitions: QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



LABORATORY ANALYTICAL REPORT

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring
Lab ID: B08043007-008
Client Sample ID: TSM0408128 S Comp

Report Date: 05/07/08
Collection Date: 04/28/08 09:42
Date Received: 04/30/08
Matrix: Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
METALS, TOTAL							
Arsenic	0.036	mg/L		0.005		E200.8	05/06/08 00:49 / jjw
Copper	0.02	mg/L		0.01		E200.8	05/06/08 00:49 / jjw
Zinc	0.02	mg/L		0.01		E200.8	05/06/08 00:49 / jjw

Report
Definitions: RL - Analyte reporting limit.
QCL - Quality control limit.

MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.



QA/QC Summary Report

Client: Point Ruston LLC
Project: Tacoma Smelter Outfall Monitoring

Report Date: 05/08/08
Work Order: B08043007

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: E200.8							Batch: 32216		
Sample ID: MB-32216	Method Blank		Run: ICPMS202-B_080501A				05/01/08 22:51		
Arsenic	ND	mg/L	4E-05						
Copper	ND	mg/L	7E-05						
Zinc	0.003	mg/L	3E-05						
Sample ID: LCS5-32216	Laboratory Control Sample		Run: ICPMS202-B_080501A				05/01/08 22:59		
Arsenic	0.496	mg/L	0.0050	99	85	115			
Copper	0.470	mg/L	0.010	94	85	115			
Zinc	0.460	mg/L	0.010	91	85	115			
Sample ID: B08043040-002AMS5	Sample Matrix Spike		Run: ICPMS202-B_080501A				05/02/08 00:23		
Arsenic	0.513	mg/L	0.0050	102	70	130			
Copper	0.457	mg/L	0.010	90	70	130			
Zinc	0.430	mg/L	0.010	83	70	130			
Sample ID: B08043040-002AMSD5	Sample Matrix Spike Duplicate		Run: ICPMS202-B_080501A				05/02/08 00:31		
Arsenic	0.503	mg/L	0.0050	100	70	130	2.0	20	
Copper	0.450	mg/L	0.010	89	70	130	1.6	20	
Zinc	0.426	mg/L	0.010	83	70	130	0.9	20	
Method: E200.8							Analytical Run: ICPMS202-B_080501A		
Sample ID: QCS - ME080125B, ME0	Initial Calibration Verification Standard						05/02/08 02:57		
Arsenic	0.0510	mg/L	0.0050	102	90	110			
Copper	0.0487	mg/L	0.010	97	90	110			
Zinc	0.0499	mg/L	0.010	100	90	110			
Method: E200.8							Analytical Run: ICPMS202-B_080502A		
Sample ID: QCS - ME080125B, ME0	Initial Calibration Verification Standard						05/02/08 14:18		
Arsenic	0.0500	mg/L	0.0050	100	90	110			
Copper	0.0479	mg/L	0.010	96	90	110			
Zinc	0.0478	mg/L	0.010	96	90	110			
Method: E200.8							Analytical Run: ICPMS202-B_080505A		
Sample ID: QCS - ME080125B, ME0	Initial Calibration Verification Standard						05/05/08 12:07		
Arsenic	0.0506	mg/L	0.0050	101	90	110			
Copper	0.0485	mg/L	0.010	97	90	110			
Zinc	0.0499	mg/L	0.010	100	90	110			

Qualifiers:

RL - Analyte reporting limit.

ND - Not detected at the reporting limit.